



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 29, 1997

Mr. Roger Christensen
U.S. Department of Energy
P.O. Box 550, MSIN K8-50
Richland, WA 99352

Dr. Kenneth Brog
Pacific Northwest National Laboratories
P.O. Box 999, MSIN P7-75
Richland, WA 99352



Dear Mr. Christensen and Dr. Brog:

Re: Notice of Correction per Dangerous Waste Compliance Inspection of the 305-B Storage Facility conducted July 30, 1997

Thank you for the assistance of U. S. Department of Energy (USDOE) and Pacific Northwest National Laboratories (PNNL) personnel during the Washington State Department of Ecology's (Ecology's) recent inspection of the 305-B Storage Facility (305-B). The purpose of the inspection was to investigate waste management issues related to Hanford occurrence report RL-PNNL-PNNLBOPER-1997-0022. This occurrence report describes a spill of acid waste in 305-B on July 27, 1997. Findings from this inspection include the following two violations of the 305-B Storage Facility Dangerous Waste Permit and two concerns.

VIOLATIONS:

#1) Facility Compliance, Condition II.L.3, of the Dangerous Waste Portion of the Hanford Facility Wide Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste.

USDOE and PNNL failed to observe all applicable state regulations per Section II.L.3.

Waste was stored in containers incompatible with the waste in violation of the State of Washington Administrative Code (WAC) Chapter 173-303-630, subsection (4).

#2) Process Information, Section 4.0 of the 305-B Storage Facility Dangerous Waste Part B Permit Application, as contained within part III, Chapter 2 of the Hanford Facility Wide Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste.

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USDOE and PNNL failed to select shipping containers for off-site shipment Per section 4.0, Process Information, and specifically subsection 4.1.1.1, Description of Containers, within the 305-B Dangerous Waste Permit Application.

Per subsection 4.1.1.1, Description of Containers, all containers used for off-site transport of dangerous wastes at the 305-B facility must be selected per the container selection criteria found in WAC 173-303-190(1). This section of the WAC refers to 49 Code of Federal Regulations (CFR) Parts 173, 178, and 179 for compliant packaging of dangerous waste for off-site transport. Specifically, USDOE and PNNL failed to ensure the provisions of 49 CFR, Subpart B, section 173.24(e)(1) and (2) were met.

CONCERNS:

1. Numerous references (Material Safety Data Sheets and standard industrial chemical references) refer to the use of soda ash as an absorbent/neutralizing agent for use in cleanup of phosphoric acid. The corrosive characteristic of the spilled material may have been removed by using a neutralizing absorbent. This may have reduced the corrosive hazard presented by the absorbed material as well as reduced the volume of dangerous waste generated as a result of the spill.
2. The sampling done on the spilled acid waste from the burst drums produced inconclusive results since the samples were taken from the floor sump and not from the spill pallet or drums themselves. Contaminants could have been picked up from the floor, the grating and the sump. Therefore, any conclusions drawn from this sampling to aid in determining the cause of this spill or to develop a critique of the spill would be of limited value. The waste analysis plan within the 305-B dangerous waste permit directs sampling be conducted of the spilled material. It is unlikely that such a contaminated sample as was taken in this case would qualify as being representative of the spilled material.

In order to correct the violations identified in this letter, please complete the following corrective measures within the time frames specified. Please be advised that failure to correct these violations may result in the issuance of an administrative order and/or penalty under the Revised Code of Washington RCW 70.105.080 and .095.

Corrective Measure #1

Facility Compliance, Condition II.L.3, of the Dangerous Waste Portion of the Hanford Facility Wide Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste.

Immediately upon receipt of this letter USDOE and PNNL must ensure that all provisions of WAC 173-303-630(4) are met for all waste container storage in 305-B, and in particular, that the ability of the container to contain the waste is not impaired due to reactions between the container and the waste it contains.

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Corrective Measure #2

Process Information, Section 4.0 of the 305-B Storage Facility Dangerous Waste Part B Permit Application, as contained within part III, Chapter 2 of the Hanford Facility Wide Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste.

Immediately upon receipt of this letter USDOE and PNNL must ensure that all provisions of WAC 173-303-190(1), and by reference of this regulation, all applicable provisions of 49 CFR Parts 173, 178, and 179 are met for packaging waste for off-site shipment from 305-B. Particular attention must be applied to packaging corrosive wastes per 49 CFR, Subpart B, section 173.24(e)(1) and (2).

Ecology recognizes the prompt action by 305-B staff to contain the spill, however, future emergency responses should address the concerns listed above. The violations cited in this letter were violations of existing permit conditions within the 305-B Dangerous Waste Permit, therefore no revisions to the 305-B Dangerous Waste Permit are required to complete the corrective measures listed in this letter. To complete the corrective measures in this letter, please complete and return the attached certification of compliance to me by September 5, 1997, indicating that the provisions of the corrective measures contained within this letter are understood and have been addressed. If you have any questions or require assistance regarding this letter, please contact me at (509) 736-3031. Requests for additional time to complete the required corrective measure must be in writing and received by me no later than September 4, 1997.

Sincerely,



Bob Wilson, Compliance Inspector
Nuclear Waste Program

BW:rb

cc: Maple Barnard, USDOE
James Rasmussen, USDOE
Gary McNair, PNNL
Ken Waller, PNNL
Glenn Thornton, PNNL
Mary Lou Blazeck, ODOE
Administrative Record: 305-B Storage Facility

CERTIFICATE OF COMPLIANCE

As a legal representative of the U. S. Department of Energy, I certify to the best of my knowledge, the completion of items requested by the Washington State Department of Ecology on August 29, 1997, with regard to the inspection of 305-B Storage Facility located on the Hanford Site, Facility ID number WA 7890008967 as shown below.

COMPLIANCE STATUS

Corrective Measure	Date Due	Date Complete	Initials	Comments
#1	09/05/97			
#2	09/05/97			

Signature, USDOE-RL Representative

Date